

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
FILE NO.: 1:18-CV-96

BRIAN HOGAN, et al.,)	<u>PLAINTIFFS'</u>
)	<u>PROPOSED VERDICT SHEET</u>
Plaintiffs,)	
)	
v.)	
)	
CHEROKEE COUNTY, et al)	
)	
Defendants,)	
_____)	

1. Did Scott Lindsay violate Brian Hogan's procedural due process rights?
Yes _____ No _____
2. Did Scott Lindsay violate Hannah Hogan's procedural due process rights?
Yes _____ No _____
3. Did Cindy Palmer violate Brian Hogan's procedural due process rights?
Yes _____ No _____
4. Did Cindy Palmer violate Hannah Hogan's procedural due rights?
Yes _____ No _____
5. Did Scott Lindsay violate Brian Hogan's substantive due process rights?
Yes _____ No _____
6. Did Scott Lindsay violate Hannah Hogan's substantive due process rights?

Yes_____ No_____

7. Did Cindy Palmer violate Brian Hogan's substantive due process rights?

Yes_____ No_____

8. Did Cindy Palmer violate Hannah Hogan's substantive due process rights?

Yes_____ No_____

9. Did Cherokee county have and allow a policy, pattern or practice which caused a violation of Brian Hogan's procedural due process rights?

Yes_____ No_____

10. Did Cherokee county have and allow a policy, pattern or practice which caused a violation of Brian Hogan's substantive due process rights?

Yes_____ No_____

11. Did Cherokee county have and allow a policy, pattern or practice which caused a violation of Hannah Hogan's procedural due process rights?

Yes_____ No_____

12. Did Cherokee county have and allow a policy, pattern or practice which caused a violation of Hannah Hogan's substantive due process rights?

Yes_____ No_____

13. Did Cherokee county fail adequately to train its employees regarding the rights of parents and children and the impropriety of the use of the custody

and visitation agreement signed by Brian Hogan causing a violation of his rights?

Yes _____ No _____

14. Did Cindy Palmer act in a negligent manner causing Brian Hogan injury?

Yes _____ No _____

15. Did Cindy Palmer act in a negligent manner causing Hannah Hogan injury?

Yes _____ No _____

16. Did Cindy Palmer act in a grossly negligent manner causing Brian Hogan injury?

Yes _____ No _____

17. Did Cindy Palmer act in a grossly negligent manner causing Hannah Hogan injury?

Yes _____ No _____

18. Did Scott Lindsay act in a grossly negligent manner causing Brian Hogan injury?

Yes _____ No _____

19. Did Scott Lindsay act in a grossly negligent manner causing Hannah Hogan injury?

Yes _____ No _____

20. Did Scott Lindsay obstruct justice with respect to Brian Hogan?

Yes _____ No _____

21. Did Cindy Palmer obstruct justice with respect to Brian Hogan?

Yes _____ No _____

**IF THE JURY ANSWERED NO TO ALL OF THE ABOVE QUESTIONS,
STOP HERE. IF THE JURY ANSWERED YES TO ANY QUESTION, THE
JURY SHOULD CONTINUE AND FILL IN THE NEXT TWO BLANKS.**

**THE JURY MUST DETERMINE WHAT AMOUNT OF DAMAGES TO
AWARD.**

22. We the jury award compensatory damages to Plaintiff Brian Hogan in the
amount of _____.

23. We, the jury, award compensatory damages to Plaintiff Hannah Hogan in the
amount of _____.

Respectfully submitted, this the 29th day of April, 2021

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CERTIFICATE OF SERVICE

This is to certify that on April 29, 2021, a copy of the foregoing PLAINTIFFS' PROPOSED VERDICT SHEET was electronically filed with the Clerk of Court using CM/ECF system, which will send notification to all counsel having made appearances in the case as follows:

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